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August 19, 2011

VIA ECF

Hon. Dora L. Irizarry
United States District Judge
Eastern District of New York
United States Courthouse
225 Cadman Plaza East
Room 4A South
Brooklyn, NY 11201-1818

Re: **Ragsdale v. Lashkar-e-Taiba et al., 1:11-cu-3893**

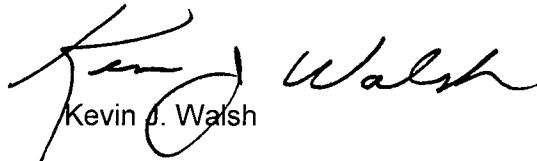
Dear Judge Irizarry:

As per your Order entered in this matter on August 17, 2011, as counsel for Defendants, Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan ("ISI") and the current and former Director Generals of ISI, Ahmed Shuja Pasha and Nadeem Taj, we have today filed our Notice of Appearance in this additional action.

We have also filed a proposed Stipulated Order to confirm that this additional Plaintiff wishes to join in the opposition interposed by Plaintiffs to Defendants' pending motion in the three related cases before Your Honor – *Rosenberg, et al. v. Lashkar-e-Taiba, et al.*, 1:10-cv-05381, *Scherr, et al. v. Lashkar-e-Taiba, et al.* 1:10-cv-05382, *Chroman v. Lashkar-e-Taiba* 1:10-cv-05448 – and that Plaintiff's counsel is amenable to treating the fully-briefed motion to dismiss in the related cases as applicable to this action.

Both the Notice of Appearance and the Stipulated Order were filed by ECF. Copies are also attached, for the convenience of the Court. Should the Court have any questions, we are available at the Convenience of the Court.

Respectfully submitted,



Kevin J. Walsh

KJW:md

Enclosures

cc: James P. Kreindler, Esq.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LINDA RAGSDALE,

Index No.: 1:11-cv-3893

Plaintiff,

-against-

NOTICE OF APPEARANCE

LASHKAR-E-TAIBA (also known as Idara
Khidmat-e-Khalq, Jamat ud Dawa, Markaz ud Dawa
and Tehrik-e-Tahaffuz-e-Qibla Awal);
MOHAMAED HAFIZ SAYEED, ZAKL ur
REHMAN LAKHVI; SAJID MAJID (also known as
Sajid Mir); AZAM CHEEMA; INTER-SERVICES
INTELLIGENCE of the ISLAMIC REPUBLIC OF
PAKISTAN, AHMED SHUJA PASHA, NADEEM
TAJ, MAJOR IQBAL and MAJOR SAMIR ALI,
Defendants.

TO: THE CLERK OF THE COURT AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that **LOCKE LORD BISSELL & LIDDELL LLP**, by Kevin
J. Walsh, hereby appears as attorneys for Defendants:

Inter-Service Intelligence Directorate of the Islamic Republic of Pakistan

Ahmed Shuja Pasha

Nadeem Taj

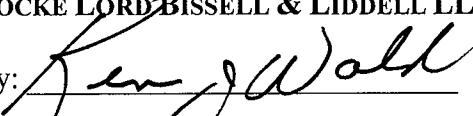
in this matter.

Defendants' right to seek dismissal on all grounds (including but not limited to lack of personal and subject matter jurisdiction), with the exception of improper service, is expressly reserved.

The below signatory certifies that he is admitted to practice in this Court.

Dated: New York, New York
August 19, 2011

LOCKE LORD BISSELL & LIDDELL LLP

By: 

Kevin J. Walsh (KW 6083)
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*Counsel for Defendants
Inter-Services Intelligence Of The Islamic Republic
Of Pakistan, Ahmed Shuja Pasha and Nadeem Taj*

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

LINDA RAGSDALE,

Index No.: 1:11-cv-3893

Plaintiff,

-against-

LASHKAR-E-TAIBA (also known as Idara Khidmat-e-Khalq, Jamat ud Dawa, Markaz ud Dawa and Tehrik-e-Tahaffuz-e-Qibla Awal);
MOHAMAED HAFIZ SAYEED, ZAKL ur REHMAN LAKHVI; SAJID MAJID (also known as Sajid Mir); AZAM CHEEMA; INTER-SERVICES INTELLIGENCE of the ISLAMIC REPUBLIC OF PAKISTAN, AHMED SHUJA PASHA, NADEEM TAJ, MAJOR IQBAL and MAJOR SAMIR ALI,

**STIPULATED ORDER RE
PROCEDURE FOR MOTION TO
DISMISS BY CERTAIN
DEFENDANTS**

Defendants.

WHEREAS, this action is related to three prior actions pending before this Court (*Rosenberg, et al. v. Lashkar-e-Taiba, et al.*, 1:10-cv-05381, *Scherr et al. v. Lashkar-e-Taiba, et al.*, 1:10-cv-05382 and *Chroman v. Lashkar-e-Taiba, et al.*, 1:10-cv-05448), hereinafter the “Pending Actions”, and has, on that basis, been assigned to this Court; and

WHEREAS, in the Pending Actions the Court on April 13, 2011 issued an Order which set a procedure and briefing schedule for motions to dismiss by Defendants, Inter-Services Intelligence Directorate of the Islamic Republic of Pakistan, Ahmed Shuja Pasha and Nadeem Taj; and

WHEREAS, pursuant to such Order, an initial motion to dismiss the Pending Actions by Defendants has been fully briefed and is pending before the Court; and

WHEREAS, Plaintiff in this action is alleged to have been injured as a result of the November 2008 Mumbai attack, which is the subject of the Pending Actions, and the claims asserted in this action are the same as certain of the claims asserted in the Pending Actions;

WHEREAS, counsel are in agreement that a single, unified procedure for all three cases will be the most efficient way to proceed and will benefit both the parties and the Court;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel:

1. The provisions of the Court's Order dated April 12, 2011 with respect to procedure for motions to dismiss by these Defendants will apply and govern motions in this action.

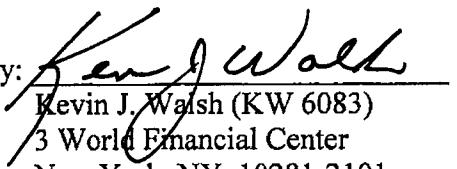
2. Defendants' initial Motion to Dismiss in the Pending Actions will be deemed to have been filed in this action. On behalf of Plaintiff Ragsdale, counsel for Plaintiff hereby adopts all arguments made and all factual submissions filed in Defendants' initial Motion to Dismiss in the Pending Actions and no further submissions will be filed on the pending motion.

3. Any decision and order entered on Defendants' initial Motion to Dismiss in the Pending Actions will be entered and effective as an Order in this Action as well.

Dated: New York, New York
August 18, 2011

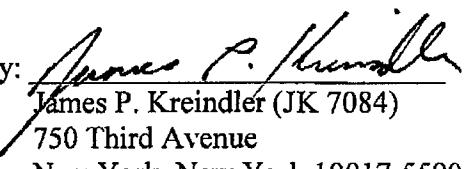
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Counsel for Plaintiff, Linda Ragsdale

*Republic Of Pakistan, Ahmed Shuja Pasha
and Nadeem Taj*

SO ORDERED:

U.S.D.J.